

# EXHIBIT

# 24

1 UNITED STATE DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 - - -

3 IN RE: :  
4 :  
4 TERRORIST ATTACKS ON :  
SEPTEMBER 11, 2001 : 03 MDL 1570 (RCC) (FM)  
5 :  
5 \_\_\_\_\_ :

6 UNITED STATES DISTRICT COURT  
7 SOUTHERN DISTRICT OF NEW YORK  
8

8 In re Terrorist Attacks on :  
September 11, 2001 :  
9 : 03 MDL 1570 (RCC) ECF  
\_\_\_\_\_ : Case

10 UNITED STATES DISTRICT COURT  
11 FOR THE SOUTHERN DISTRICT OF NEW YORK

12 THOMAS E. BURNETT, SR., in :  
his own right as the father :  
13 of THOMAS E. BURNETT, JR., :  
Deceased, et al., :  
14 Plaintiffs, :

15 vs. :

16 AL BARAKA INVESTMENT AND :  
DEVELOPMENT CORPORATION, :  
17 a/k/a AL BARAKA BANK a/k/a :  
DALLAH ALBARAKA GROUP, LLC, :  
18 et al., :  
Defendants. :

19 - - -  
20 TUESDAY, NOVEMBER 15, 2007  
21 CONFIDENTIAL  
22 - - -

22 MAGNA LEGAL SERVICES  
2 Penn Center Plaza  
23 Suite 910  
Philadelphia, Pennsylvania 19102  
24 (866) 624-6221

Videotape deposition of PHILIP GRIFFIN,  
taken pursuant to notice, was held at the law  
offices of JONES DAY, 51 Louisiana Avenue N.W.,  
Washington, D.C., commencing at 11:00 a.m., on the  
above date, before Deborah A. Brazukas, a Registered  
Professional Reporter, Certified Shorthand Reporter  
of New Jersey, License No. XI 01938, and Notary  
Public.

APPEARANCES:

MOTLEY RICE LLC  
BY: ROBERT T. HAEFELE, ESQUIRE  
28 Bridgeside Boulevard  
P.O. Box 1792  
Mt. Pleasant, South Carolina 29465  
843.216.9184  
Counsel for the Burnett Plaintiffs

COZEN O'CONNOR  
BY: SEAN P. CARTER, ESQUIRE  
1900 Market Street  
Philadelphia, Pennsylvania 19103-3508  
215.665.2105  
Counsel for the Federal Insurance  
Plaintiffs

JONES DAY  
BY: JAMES E. GAUCH, ESQUIRE  
THOMAS A. BEDNAR, ESQUIRE  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001-2113  
202.879.3939  
Counsel for the Defendant SBG

1 A. Correct -- no. Excuse me, 1992.

2 Q. 1992. When in 1992?

3 A. July.

4 Q. July.

5 What did you do in July of 1992?

6 A. I retired from the foreign service at  
7 Jeddah. In other words, my travel, when I left  
8 Jeddah, I was -- I was a retiree. There was some  
9 financial benefits to doing it that way rather  
10 than coming back here and retiring.

11 But I retired there and came back  
12 here and moved back into our residence in  
13 suburban Maryland.

14 Q. And then what did you do for work?

15 A. I had been approached by Saudi  
16 Binladin Group before I left Jeddah as to the  
17 possibility of representing them in -- in the  
18 U.S. And I did not commit myself. I -- it was  
19 an interesting proposition. And it was along the  
20 lines of what I envisioned I might do in  
21 retirement, drawing on my experience and language  
22 qualification -- area -- language and area  
23 qualifications in Europe and the Middle East. So  
24 I undertook to look at the -- look at the idea

1 and explore possibilities of doing such  
2 representation in the Washington, D.C. area. And  
3 I -- I didn't -- sign on and do anything for  
4 several months until we got ourselves  
5 reconstituted, re -- reestablished in our  
6 residence. And so that -- I think I answered  
7 your question.

8 Q. How long did you work in Saudi  
9 Arabia?

10 A. How long did I work in Saudi Arabia?

11 Q. Yes. Was it that '89 to '92 time  
12 period?

13 A. No, I worked previously in Saudi  
14 Arabia.

15 Q. And what had you done previously in  
16 Saudi Arabia?

17 A. I was a commercial economic officer  
18 in Dhahran, D-H-A-H-R-A-N, Dhahran, from 1965 to  
19 '68, 1965 to 1968.

20 Q. And --

21 A. Oh, excuse me. Later for -- I had a  
22 short tour in Saudi Arabia in -- at -- in Dhahran  
23 in '71 -- '71, '72.

24 Q. Doing what?

1 secretary of state. But I had met him originally  
2 back when -- at the time when I opened the  
3 embassy in Abu Dhabi, he was, I think, deputy  
4 assistant or assistant secretary of defense at  
5 the Pentagon.

6 And then, when I met him again  
7 after that, in the -- I would say in the period  
8 around 2000 -- excuse me, 1995, '96, he was -- he  
9 had a consulting firm on Wilson Boulevard here in  
10 the Washington area. And I had -- I'm -- I'm  
11 trying to recollect. I had gotten to know one of  
12 his assistants in the -- in the consulting firm  
13 and had mentioned that Hasan Binladin, who was  
14 the -- my boss in the Saudi Binladin Group, was  
15 coming to Washington on a scheduled visit, and  
16 would it be convenient for me to bring him around  
17 and meet you, Mr. Armitage. And he said of  
18 course. And -- and we did that.

19 I had no other -- I had contact  
20 with one -- one person in particular in his  
21 office after that, but no direct contact with him  
22 in his later positions.

23 Q. Could that -- I'm sorry, could that  
24 visit have been as late as 1999?

1 no.

2 Q. What would you call him?

3 A. A consultant.

4 Q. Of what kind?

5 A. Political, economic, commercial  
6 information that would be valuable to a client.

7 Q. And would --

8 A. Let me -- let me clarify. My  
9 relationship with Armitage and Associates was  
10 very narrow in scope. It -- it only really  
11 involved my relationship with Lincoln Blumfield.  
12 And that was very limited, too. I mean, it would  
13 be months go by that I didn't talk with Lincoln.  
14 And we'd see each other at a commercial  
15 conference or Chamber of Commerce meeting here  
16 in -- in town. And we would -- we would say,  
17 what's -- what's happening, what's happened since  
18 we last talked.

19 And -- and it's possible in 1999,  
20 in the earlier part of that period, that I -- I  
21 may have had conversations with him on -- on  
22 something or the other but I don't recall what  
23 that was.

24 Q. And during the time period, during

1 Monroe Street, and then 1700 Rockville Pike?

2 A. Suite 400.

3 Q. Suite 400.

4 All right. Why did -- why did SBG  
5 open a U.S. office?

6 A. To -- one reason was to have the  
7 company better known in the United States among  
8 possible business partners or business clients.  
9 Let -- let me explain that for a minute. The  
10 company -- the group was well known in the Middle  
11 East for their construction activities and  
12 certain other activities they had. It was not  
13 well known in the United States except by some  
14 specific companies like GE and York Air  
15 Conditioning and a few others. So they -- they  
16 wanted to become better known.

17 And the second -- the related  
18 second reason for the office was to have someone  
19 on the ground here who could follow up -- who  
20 could become knowledgeable about possible  
21 projects that would be of interest to the mother  
22 company, to the wholly owned company, and to  
23 follow up on such activities, such leads; have --  
24 have somebody on the ground, which they didn't



1 wouldn't use it. This calls for speculation.

2 THE WITNESS: I would want to have  
3 the definition, clarification of dispense  
4 service is. That's a very good question.  
5 Because I -- I didn't envision myself as  
6 someone who would be traipsing down to the  
7 airport to meet every brother who came to town.

8 MR. HAEFELE: Can we have this  
9 marked, please.

10 (Whereupon, Exhibit No. Griffin-1  
11 was marked for identification.)

12 BY MR. HAEFELE:

13 Q. Sir, I'm showing you an item that's  
14 been marked as Griffin-1 for identification. Can  
15 you just take a look at this document and tell us  
16 if you recognize that document.

17 MR. GAUCH: Do you have copies?

18 MR. HAEFELE: I wish I did. I think  
19 I do. Oh, I do. There you go.

20 MR. GAUCH: Sean, do you need a  
21 break? We can get extras if you need one.

22 MR. CARTER: No. It's okay. I'll  
23 just look over someone's shoulder.

24 MR. GAUCH: I'm sorry, what was the

1 very seldom got a yes or no, follow up on it or  
2 don't follow up on it. I generally didn't hear  
3 anything about it. So after a while, I took that  
4 to mean that they weren't interested.

5 Q. Was it your job to facilitate  
6 business with -- between SBG and other U.S.  
7 businesses?

8 A. To the extent that that was necessary  
9 and that I was requested specifically to do  
10 such -- such service.

11 Q. And did that happen?

12 A. It happened occasionally.

13 Q. Was it to promote U.S. business?

14 A. Always.

15 MR. GAUCH: Object to the form.

16 BY MR. HAEFELE:

17 Q. Always?

18 A. Always to promote U.S. business.

19 Q. Always?

20 A. Yes, that was the purpose -- the  
21 purpose that I was in the job.

22 Q. Was it to -- to continue to foster  
23 existing U.S. business relations?

24 MR. GAUCH: Object to the form.

1 some of them. Most of them were -- were not  
2 firms that we'd ever heard of before. That's not  
3 the case with K&M.

4 Q. How were you paid for your work at  
5 SBG?

6 A. Excuse me?

7 Q. How were you paid? How much?

8 A. I was paid \$10,000 a month.

9 Q. And did that money come from SBG?

10 A. Came -- came from SBG.

11 Q. And the documents that SBG produced  
12 to us in discovery in the litigation, they show a  
13 whole bunch of expenses for the U.S. office. Did  
14 SBG cover all those expenses as well?

15 A. They -- they covered --

16 MR. GAUCH: Object to the form.

17 THE WITNESS: -- all -- all those  
18 expenses through budgets that I submitted  
19 originally every quarter. But that -- it was  
20 considered too quick, too -- it was not enough  
21 time to turn around quarterly budgets.

22 BY MR. HAEFELE:

23 Q. But SBG had to approve all those  
24 budgets, right?

1           A.       SBG had to approve it all. I laid it  
2 out and -- anyway, it -- we settled -- we settled  
3 on budgetary submissions every six months.

4           Q.       And any money that SBG, your -- the  
5 office that you were in, had -- came from SBG  
6 Saudi Arabia, correct?

7           A.       Correct.

8           Q.       And you didn't have any independent  
9 source of income in your office, correct?

10          A.       Didn't have what?

11          Q.       Any independent source of income,  
12 other than SBG.

13          A.       No, I did not have.

14          Q.       The business that you did didn't  
15 generate any income for the US office; it  
16 generated income for --

17          A.       No. No. No, not at all. I wish it  
18 had, but it -- it didn't.

19          Q.       And when the U.S. office shut down,  
20 it had some money left, right?

21          A.       A little bit of money, yes.

22          Q.       About 900 and some dollars?

23          A.       That sounds about right.

24          Q.       And that money got sent back to --

1 sometimes it wouldn't be anything serious in two  
2 months.

3 Q. And is that something that you faxed  
4 or something that you sent by mail?

5 A. Both. Sense -- sensitive things  
6 would always -- most always be sent by letter.

7 Q. Okay. And how -- during your six and  
8 a half years, how many times would you estimate  
9 that you've sent such proposals?

10 A. They weren't always proposals. They  
11 were informational material that if they wanted  
12 to follow up further or were interested in  
13 another vain, they could -- they could inform me.

14 Oh, I don't know, a hundred or so.

15 Q. Okay. Would that be in a format of  
16 a -- of a memo or a letter or what?

17 A. It would be in the format of a memo.

18 Q. Okay. Earlier today you mentioned  
19 that you had made -- or I'm sorry, that -- that  
20 there -- the family had made some efforts to get  
21 Osama Binladin back into the fold by -- by  
22 engaging him economically in the company. Is  
23 that fair?

24 A. That's what I understood, yes.

1           A.       I don't know what -- I don't know  
2    what -- they -- they probably had some  
3    rudimentary computer system. But I -- I didn't  
4    share it and what they -- if they shared it with  
5    anyone, I'm not -- I'm not knowledgeable about  
6    it.

7           Q.       I'll bypass the notion that a company  
8    called Techmaster had rudimentary computer  
9    systems.

10                   Who was Mr. McBride's successor?

11          A.       A gentleman by the name of -- come  
12    on.

13          Q.       Was his name Akeil?

14          A.       It's -- it's one of these instant  
15    words that flipped -- flipped right out of my  
16    head. It's a Polish name.

17          Q.       All right. Well, if you should think  
18    about it, please let me know.

19          A.       He was -- yes, he was the successor  
20    of Mr. McBride.

21          Q.       Was it Hasan Binladin that directed  
22    your work?

23          A.       Yes.

24          Q.       And you considered him to be your

1 boss, right?

2 A. Right.

3 Q. You reported directly to him?

4 A. Reported directly to him.

5 Q. And how often did SBG employees come  
6 to the U.S.? And by employees, that would  
7 include the officers, the directors, all the SBG  
8 individuals from Saudi Arabia. How often did  
9 they come to the U.S.?

10 A. How -- how often did they come to the  
11 U.S. --

12 Q. Yes.

13 A. -- or how often did they come to SBG  
14 (USA)?

15 Q. Well, you said earlier you didn't  
16 want to be a travel agent.

17 A. Right.

18 Q. And I'm assuming that was because  
19 that had started to occur at some point, and you  
20 wanted to make it clear that that's not what  
21 you're -- you saw your job as.

22 MR. GAUCH: Object to the form.

23 THE WITNESS: Well, I -- I did enough  
24 of it -- I did enough of it in the foreign

1 their dealings with Iridium; although I did  
2 attend two or three quarterly board meetings.

3 Q. Okay. During --

4 A. As -- as an observer.

5 Q. During the time period between early  
6 January '97 through the end of '99, you made a  
7 number of calls to Iridium. What would those  
8 calls have been for?

9 A. Generally to find out information  
10 about the upcoming board meetings. I had no --  
11 no other function.

12 Q. What board meetings?

13 A. Board meetings of Iridium.

14 Q. And what was your involvement with  
15 the board meeting of Iridium?

16 A. I was -- I asked Sheikh Hasan --  
17 since I didn't know anything about Iridium when  
18 it first was being formulated and -- and put  
19 together, I said I -- I received some calls from  
20 telecommunications companies wanting to --  
21 assuming -- who got my number and wanted to  
22 know -- have information about Iridium and -- and  
23 what SBG's role was or S -- and I didn't know. I  
24 didn't know anything about Iridium. So I -- he



1 said, well, why don't you attend the -- the board  
2 meeting just as an observer. And I thought that  
3 was a good idea. And I did that on two or three  
4 occasions.

5 Q. And did you ever -- you're aware that  
6 Iridium had an office that opened up in -- in  
7 Georgetown in May of '97, right?

8 A. Yes.

9 Q. And did you go to that office on  
10 occasion?

11 A. Never went to that office but talked  
12 with the people staffing it. There were two  
13 gentleman as I recall.

14 Q. Who staffed it?

15 A. They were Arab-Americans.

16 Q. Do you remember who the name -- who  
17 they were?

18 A. I don't -- I don't remember the  
19 names. I had...

20 Q. All right.

21 A. I had some occasional phone contacts  
22 with them. They knew who I was.

23 Q. And the office was particularly  
24 Middle East Iridium, right?

1 A. That's correct.

2 Q. And so it was particularly the office  
3 that -- that SBG was involved in, correct?

4 MR. GAUCH: Object to the form.

5 THE WITNESS: Correct.

6 Excuse me, let me -- let me  
7 amplify. I'm giving you a lot of  
8 background, which I don't know. SBG was  
9 hesitant or maybe financially strapped to  
10 make a full participatory share. And in the  
11 beginning, they had the participate --  
12 participatory responsibility for the Middle  
13 East. They eventually shared that with a --  
14 with another middle eastern company, a  
15 Beirut Saudi bin -- Saudi-Lebanese company,  
16 so that they split the participatory amount  
17 in -- in half.

18 And I don't remember  
19 what -- what the Saudi -- other Saudi  
20 participant was, but --

21 BY MR. HAEFELE:

22 Q. Who -- who opened the -- the Middle  
23 East Iridium office in -- in Georgetown?

24 A. These two fellows that -- that I

1 directly, there was -- I had no successor in the  
2 position. They -- SBG decided to close the  
3 office and not to appoint a successor or -- or to  
4 rent any other space in -- somewhere else in the  
5 Washington -- Washington Metropolitan area.

6 Q. I'm not asking you --

7 A. There -- there was some --

8 Q. Sir, I'm not asking you whether or  
9 not anybody continued to have an office in  
10 Washington or -- or anything along those lines.

11 I'm asking you, the chores that  
12 you did to service SBG with its U.S. business  
13 relations, they continued to be performed by  
14 someone, correct?

15 A. I -- I think most of them dropped by  
16 the wayside.

17 Q. Well, does -- does the company still  
18 service its contacts with -- with GE?

19 A. Yeah, but I wasn't -- they didn't --  
20 GE didn't -- I didn't deal with GE. Yes, they  
21 deal with GE, to the extent that the major  
22 projects are still unfinished.

23 Q. Sir, while -- while you were with  
24 SBG, was it involved with a number of different

1 organizations that were business-promoting  
2 organizations?

3 A. Business-promoting organizations?

4 Q. For -- for example --

5 A. Oh, yes. You mean like Chamber of  
6 Commerce?

7 Q. The Chamber of Commerce, correct.

8 A. Yeah, I -- I was a member of the  
9 Arab-American Chamber of Commerce here in  
10 Washington, D.C.

11 Q. And wasn't SBG also a member of the  
12 Middle East Policy Council?

13 A. Which is more of a think tank. It  
14 was not a -- they -- I mean, they enhanced  
15 business activities as well, but --

16 Q. They -- they were part of that,  
17 correct?

18 A. They were a different type of  
19 organization. But they -- yes, they -- Binladin  
20 was -- had a board member on -- on that  
21 organization.

22 Q. And they continue to have a board  
23 member on that, right?

24 A. Huh?

1 Q. And they continue to have a board  
2 member on that, correct?

3 A. I think they continue to have.

4 Q. Right.

5 And they continue -- and that --  
6 what's the purpose of Middle East Policy Council?

7 A. To enhance an understanding in all  
8 areas with Arab countries in the Middle East and  
9 the United States.

10 Q. And SBG was involved with the  
11 National U.S. Arab Chamber of Commerce, right?

12 A. That's correct.

13 Q. And they were involved with the  
14 Middle East Institute, right?

15 A. Yes, I'm a long-time member.

16 Q. And they were involved with the World  
17 Affairs Council of Washington, D.C., right?

18 A. World Affairs Council? I know what  
19 it is. I -- I don't think I was -- other than  
20 going to a couple of their meetings, I was not a  
21 member, as I recall.

22 MR. HAEFELE: Do we need to break? I  
23 have a -- I have a few more questions, but I  
24 don't want to --

1 MR. GAUCH: Do you want to go off the  
2 record for a second?

3 MR. HAEFELE: Yeah. Yeah.

4 THE VIDEOTAPE OPERATOR: We're going  
5 off the record. The time is 1:46.

6 (Whereupon, there was a discussion  
7 held off the record.)

8 THE VIDEOTAPE OPERATOR: We're going  
9 back on the record. The time is 1:48.

10 BY MR. HAEFELE:

11 Q. Sir, there's also an entity called  
12 U.S. Saudi Arabian Business Council in  
13 Washington, D.C., right? You were -- was SBG  
14 involved with that?

15 A. I was involved in it to the extent  
16 that they had meetings or seminars from time to  
17 time. But I was not a member of it.

18 Q. Okay. Is SBG still involved with the  
19 U.S. Arab Chamber of Commerce?

20 A. I doubt it. I don't know.

21 Q. They are still involved --

22 A. I doubt it because I don't know who  
23 would -- who would do that function.

24 Q. They're still involved with the

1 Middle East Policy Council you said, correct?

2 A. Yes, they are.

3 Q. And SBG has also sponsored events  
4 like conferences in the U.S. to foster U.S. Saudi  
5 business relations, right?

6 A. Repeat that, please.

7 Q. SBG has also sponsored events like  
8 conferences in the U.S. to foster U.S. and Saudi  
9 business relations, right?

10 MR. GAUCH: Object to the form and  
11 foundation.

12 THE WITNESS: I think -- I think they  
13 have. I was not involved in any such, but I  
14 think they have done so.

15 BY MR. HAEFELE:

16 Q. Do you know what conferences they --  
17 they sponsored?

18 A. No, I don't know specifically. It  
19 was -- it probably -- to the extent they did, it  
20 was probably after I closed the office.

21 Q. Did you attend the International  
22 Franchise Expo in Washington, D.C. in 2001?

23 A. I did indeed.

24 Q. And you were obviously no longer with

1 the -- with SBG at the time, right?

2 A. Well, wait a minute. In -- in '01?

3 Q. In 2001.

4 A. I'm sorry, I -- the time frame. I  
5 had -- had attended some of their annual  
6 meetings, their franchise organization, at annual  
7 meetings in Washington, and enhancing new  
8 franchises and so forth. I attended at least two  
9 of those when I was still with the company. I  
10 did not attend in '01 because I wasn't with the  
11 company any longer.

12 Q. Okay. Do you know whether or not SBG  
13 continued to be involved with the International  
14 Franchise Expo?

15 A. I do not know that. There were --  
16 there were several -- from the -- from the  
17 conferences that I attended, prior to the end of  
18 '99, there were several opportunities that I  
19 thought might be attractive. And I sent them --  
20 sent information to Sheikh Hasan about them. And  
21 they may have followed up on one or more of  
22 those.

23 Q. What role does Mr. Rihani play on  
24 behalf of SBG presently?



1           A.       Presently, he's a part-time advisor,  
2   counselor, and -- to Sheikh -- Sheikh Bakr, and  
3   follows up on business relationships that need  
4   some nurturing and -- and assistance from time to  
5   time.

6           Q.       And in fact, he's the member that  
7   the -- that's the representative member for SBG  
8   on the Middle East Policy Council; hasn't he  
9   been?

10          A.       That's right. That's right. He's a  
11   very trusted advisor, and he works part-time,  
12   and -- at least he has been working part-time.  
13   He goes back and forth between his home in  
14   Carolina and -- and New Jersey -- and Jeddah.

15          Q.       Did you speak with the press on --  
16   after 9/11 regarding the Saudi Binladin Group?

17          A.       Did I speak to the press?

18          Q.       Yes.

19          A.       I think I did. I think I spoke with  
20   somebody from -- maybe from New York Times and  
21   the Washington Post.

22          Q.       Were you authorized by the family to  
23   speak on behalf of SBG?

24          A.       I was not authorized by the family.